

EXHIBIT H

2016-004750
SF-C. Depo. in

1

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK

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3 ELIEZER LOPEZ and SUHAIL LAUREANO,

4 PLAINTIFFS,

5 -against-

Case No.:
17-CV-00181 (LAP)

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7 CITY OF NEW YORK, LUIS LINARES, LUIS ANGELES, and JOHN
8 DOES ##1-3,

9 DEFENDANTS.

-----X

10 DATE: January 17, 2018

11 TIME: 11:35 A.M.

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14 DEPOSITION of a Plaintiff, SUHAIL

15 LAUREANO, taken by the Defendants, pursuant to a Notice and

16 to the Federal Rules of Civil Procedure, held at the

17 offices of the New York City Law Department, 100 Church

18 Street, New York, New York 10007, before David

19 Sheldon, RPR, a Notary Public of the State of New York.

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S. LAUREANO

1 A R N E L I O C O R T E S, a Spanish interpreter,
2 solemnly swore to translate the following questions from
3 English to Spanish and answers from Spanish to English:
4 S U H A I L L A U R E A N O, called as a witness, having
5 been first duly sworn, through an interpreter, by a Notary
6 Public of the State of New York, was examined and testified
7 as follows:

8 EXAMINATION BY

9 MS. SELIGMAN WEISS:

10 Q. Please state your name for the record.

11 A. Suhail Laureano.

12 Q. What is your address?

13 A. 1160 Burke Avenue, B-u-r-k-e, Apartment 6F,
14 Bronx, New York 10469.

15 Q. Good morning. My name is Rachel Seligman, and I
16 represent the defendants in this action, which is pending
17 in the United States District Court. The docket number in
18 this case is 17-CV-00181. The purpose of this deposition
19 is for me to ask you questions about the incident that
20 gives rise to this lawsuit.

21 Have you ever had your deposition taken before?

22 A. Yes.

23 Q. When?

24 A. Um, it was at home. I'm not sure if it was in
25 September or October, I think.

S. LAUREANO

1 of the park is, um, by Crotona and Arthur Avenue.

2 Q. So is VIP closer to the park than your house?

3 A. Yes. VIP is closer.

4 Q. When was the last time that you went to the park,
5 Crotona Park?

6 A. To the park?

7 Q. Yes.

8 A. In 2016.

9 Q. And why did you go to the park in 2016?

10 A. With a friend of mine.

11 Q. What did you do?

12 A. I went to take some pictures.

13 Q. Pictures of what?

14 A. Of the area where the accident happened.

15 Q. And who did you go with?

16 A. Um, with Mirna, a family friend.

17 Q. How do you spell that?

18 A. M-e -- I'm sorry; M-i-r-n-a.

19 Q. That's a friend of yours?

20 A. A family friend.

21 Q. Is this person a friend of yours?

22 A. Yes.

23 Q. Was anyone with you when you went to the park to
24 take photos in 2016?

25 A. No.

S. LAUREANO

- 1 Q. Whose idea was it to take the photos?
- 2 A. My lawyers.
- 3 Q. How many photos did you take?
- 4 A. Um, many.
- 5 Q. Do you know how many?
- 6 A. Around twenty.
- 7 Q. Do you know if Mirna took any photos?
- 8 A. No, not that I know of.
- 9 Q. Do you remember what day you went to take those
- 10 photos at Crotona Park?
- 11 A. No.
- 12 Q. Was it in the winter or in the spring?
- 13 A. In the winter, I think.
- 14 Q. How did you take those photos? What did you use?
- 15 A. With my phone.
- 16 Q. What kind of phone?
- 17 A. An iPhone.
- 18 Q. Do you still have the same phone?
- 19 A. No.
- 20 Q. What did you do with the photos?
- 21 A. I saved them.
- 22 Q. Where did you save them?
- 23 A. In a folder.
- 24 Q. On a computer?
- 25 A. No. In my email.

S. LAUREANO

1 Q. Did you hold onto the photos?

2 A. Yes.

3 Q. And other than those twenty photos that you said
4 that you took in 2016 with Mirna, have you taken any other
5 photos of the location where the accident occurred?

6 A. No.

7 MS. KUAN: Objection to the form.

8 Q. In 2015, did you take any photos of where the
9 accident occurred?

10 A. No.

11 Q. Why did Mirna go with you to the park to take
12 those photos in 2016?

13 A. Um, because, um, she lives very close to the
14 park, also.

15 Q. So why did she go with you?

16 A. Because she knew more or less where the accident
17 happened.

18 Q. And how did she get that information?

19 A. Because when the accident happened, she was
20 looking out of her window and she saw what's going on.

21 Q. So Mirna told you that she saw what happened with
22 your husband on December 7, 2015?

23 MS. KUAN: Objection.

24 A. No.

25 Q. What did she say to you then?

S. LAUREANO

1 2000?

2 A. I -- we pass by the park. I pass by the park
3 with him, but, um, I have never been inside of the park
4 with him since then.

5 Q. Are there schools near the park?

6 A. No.

7 Q. When you went with Mirna in 2016 to take photos,
8 where exactly did you go in the park?

9 A. We went to the end of the park where she
10 remembers that a body was taken out before.

11 Q. Who was taken out?

12 A. The person that had been taken out of that area
13 was injured, who was taken in an ambulance.

14 Q. What was that location?

15 A. I don't know the address.

16 Q. Can you describe where in the park that was?

17 A. I know that there's Arthur Avenue, but I don't
18 know the crossing street, the cross street. I don't know
19 if that's Crotona Park North.

20 Q. Did you go to this location because that's where
21 Mirna said that she saw someone; is that right?

22 A. Yes.

23 Q. Other than that location, did you go to any other
24 location to take any other photographs when you were with
25 Mirna in 2016?

S. LAUREANO

1 A. 1993.

2 Q. And at the time, you were both living in Puerto
3 Rico?

4 A. Correct.

5 Q. Why did you wait until 2009 to get married?

6 A. I don't know.

7 Q. Had your husband ever been married before?

8 A. No.

9 Q. When did you first learn that Mirna saw something
10 happen on December 7, 2015 in the park?

11 A. (No verbal response.)

12 Q. When did you first learn that Mirna saw something
13 in the park on December 7, 2015?

14 A. On the same day of the accident.

15 Q. What did she tell you?

16 A. That she had seen something through the window,
17 but that she did not know exactly what it was.

18 Q. Did she call to tell you this?

19 A. I had called her, because I was worried that he
20 was not home yet.

21 Q. And what did she say?

22 A. That she had saw something through the window and
23 that she had seen the bag that normally he takes, but, um,
24 that she wasn't sure that it was him.

25 Q. Where did she see the bag?

S. LAUREANO

1 A. She saw it through the window when they were
2 taking out the body out of the area of the accident.

3 Q. Did she ever tell you that she saw him running
4 through the park on December 7, 2015?

5 A. No.

6 Q. Did she ever tell you that she saw him jump?

7 A. No.

8 Q. Did she ever tell you that she saw him get pushed
9 by a police officer?

10 A. No.

11 Q. Did she say anything about how he got injured?

12 A. No.

13 Q. Did she ever tell you that she called 911?

14 A. No.

15 Q. Do you know if she took any photographs on
16 December 7, 2015?

17 A. Not that I know of.

18 Q. So the incident that we're here about occurred on
19 December 7, 2015; is that right?

20 A. Yes.

21 Q. Do you know what time the incident involving your
22 husband and police officers occurred?

23 A. Around 3 p.m.

24 Q. Do you recall what the weather was like that day?

25 A. No.